RESPONSE

Claims 1-31 remain pending in this continuation application. The claims have not been amended. The specification has been amended to include the full text of certain well-known wireless networking acronyms. Reconsideration of the rejections set forth in the April 16, 2007 office action is respectfully requested in view of this response. In particular, applicants specifically traverse the 35 U.S.C. § 102 rejection of claims 1-6, 8-16, 18-23 and 25-30 as being anticipated by Williams (EP 1296216A1). The office action has failed to make out a *prima facie* case of anticipation under section 102, and therefore the rejection should be withdrawn. Applicants traverse the 103 rejection of claims 7 and 24 for the same reasons as noted below with respect to the 102 rejection over Williams.

In rejecting claims 1 and 18 as being anticipated by Williams, the office action makes the following three assertions: (1) Williams discloses a predictive text system and device for use with a mobile device having a reduced-key QWERTY keyboard; (2) Williams discloses an ambiguous word list comprising a plurality of keystroke combinations, each keystroke combination representing a plurality of key selections on the reduced-key QWERTY keyboard, wherein the keystroke combinations present in the ambiguous word list are associated with more than one common predicted word; and (3) Williams discloses a predictive text system module that determines a predicted word and engages an alert mechanism on the mobile device if the input keystroke combination is present in the ambiguous word list. Each of these assertions, however, lack any support in the Williams reference, as detailed below, and therefore the anticipation rejection under 102 is defective and should be withdrawn.

With respect to the first assertion, the office action refers to page 5, table 1 of the Williams reference in support of its disclosure of "a predictive text system and device for use

with a mobile device **having a reduced-key QWERTY keyboard**." (emphasis added) Table 1 of Williams is set forth below:

1 65	2 - abc	3 - def
4 - ghi	5 - jkl	6 - mno
7 - pqrs	8 - tuv	9 - wxyz
* - + 66	0 - ␣ 67	# - ⇧

Table 1. Layout of the alphanumeric keys 7.

As clearly demonstrated by the table above, Williams discloses a standard telephone keypad, not a reduced key QWERTY keyboard as disclosed and claimed in the present application. Moreover, applicants have searched the Williams reference and have not been able to find any mention of using its predictive editor application with a device having any kind of QWERTY keyboard, let alone a QWERTY keyboard of the reduced key type. Therefore, because Williams does not disclose or suggest all of the claim limitations, the anticipation rejection over Williams is flawed and should be withdrawn.

With respect to the second assertion, the office action refers again to page 5, table 1 (set forth above), and also refers to page 2, paragraph [0003] of Williams, and in particular lines 20-24 thereof in support of its disclosure of "an ambiguous word list comprising a plurality of keystroke combinations, each keystroke combination representing a plurality of key selections on the reduced key QWERTY keyboard, wherein the keystroke combinations present in the ambiguous word list are associated with more than one common predicted word," as set forth in claim 1 for example. Table 1 of Williams, however, certainly does not disclose the claimed

"ambiguous word list" as described in claims 1 and 18. Moreover, paragraph [0003] of Williams, set forth in its entirety below, doesn't come close to describing this claim limitation either:

> **[0003]** An object of the invention is to provide a mobile phone with a predictive editing program allowing more flexible text editing. This object is achieved by providing a mobile phone having a display, a keypad having a plurality of keys associated with several letters each and a further plurality of keys, processor means controlling the display means in accordance with the operation of the keypad, a predictive editor program for generating an output containing word matching a received string of ambiguous key strokes, an editor application controlled by the processor means for editing a text based on the predictive editor programs interpretation of key strokes, and comprising means for storing strings of entered words, means for storing a sequence of key stokes, said sequence being updated upon the occurrence of a new key stroke, and being used as input to the predictive editor program, means for storing a list of matching words received from said predictive editor program, said processor means combines the text string and one word from the list of matching words for displaying in the display of at least a part of said text string and one word from the list of matching words, said one word from the list of matching words is marked in comparison to the remaining part of the text string and added to the text string upon acknowledgement by the user, and said processor means displaying a cursor marking the position at which a character can be added or deleted.

Paragraph [0003] of Williams, and in particular lines 20-24 thereof, simply do not relate to the concept of an ambiguous word list as set forth in claims 1 and 18. Rather, this portion of Williams merely states that a predictive editor program generates an output containing word matching a received string of ambiguous key strokes and also describes an "editor application controlled by the processor means for editing a text based on the predictive editor programs interpretation of key strokes, and comprising means for storing strings of entered words, means for storing a sequence of key strokes, said sequence being updated upon the occurrence of a new key stroke. . ." Notably missing from this portion of Williams is any mention of a list of ambiguous words, where the list comprises "a plurality of keystroke combinations, each keystroke combination representing a plurality of key selections on the reduced key QWERTY keyboard," as required by claims 1 and 18 of this application. Therefore, because Williams does not disclose the claimed "ambiguous word list," the anticipation rejection over Williams is flawed and should be withdrawn.

And finally, with respect to the third assertion, the office action refers to page 3, paragraph [0022] of Williams (and in particular lines 56-58 thereof), in support of its disclosure of an alert mechanism that is engaged on the mobile device if the input keystroke combination is present in the ambiguous word list. This portion of Williams, however, which is set forth below in its entirety, only refers to highlighting letters of a word to-be-predicted as the user is typing on the telephone keypad so as to indicate to the user that the predictive editor system has not yet figured out what word is being typed, i.e., the word "has not been fixed yet."

[0022] Data is entered on the keypad 2 which comprises of individual alphanumerical keys 7. Most of these keys 7 have multiple meanings, represented by letter, numbers and symbols printed on the keys. The entered text is shown in the display 3 of the phone. The text already entered (and accepted by the user) is shown in the same text format as the standard display format of the phone. The word presently being entered is underlined or reversed in colours in order to indicate that the letter string has not been fixed yet. The predictive editor is able to interpret individual keys and multiple key sequences in several ways simultaneously.

As described in more detail in the present application, the point of engaging the alert mechanism in the claimed invention is to point out to a user of the mobile device having a reduced-key QWERTY keyboard that the word which has been predicted may not in fact be the word that the user meant to type. Because certain keystroke combinations may not be easily discernable by the system, the alert mechanism, when combined with the appearance of the keystroke combination on the ambiguous word list, alerts the user that they may want to pay close attention to the predicted word so as to ensure the proper meaning of the entered text. This teaching is entirely missing from the relied-upon portion of Williams referred to above. Thus, for this additional reason the anticipation rejection over Williams is flawed and should be withdrawn.

This application is now in condition for allowance.

Respectfully submitted,

JONES DAY

David B. Cochran (Reg. No. 39,142)
Jones Day
North Point, 901 Lakeside Avenue
Cleveland, Ohio 44114
(216) 586-7506